

University of Missouri

Office of Animal Care and Quality Assurance

50 McReynolds Hall
Columbia, MO 65211

Phone: 573-882-3681

5/12/2014

To: NIH Office of Laboratory Animal Welfare

Re: Invitation to Comment on Proposed Guidance Regarding Significant Changes to Ongoing Animal Activities

When new regulatory guidance is provided regarding animal research, we feel the most important thing to keep in mind is what the new guidance will do to improve animal welfare in research. It is also important that the regulatory agency be mindful of the burden that is placed on investigators, IACUCs, and institutions when new regulations are put in place. Thus, the University of Missouri appreciates OLAWs request for information and the opportunity to provide the following comments and suggestions on the proposed guidance on significant changes.

Approval of ranges of variables

We completely agree that ranges of variables are needed for many scientific studies as long as the ranges do not negatively affect animal welfare and are scientifically justified. However, if an investigator uses a single value or range of values that negatively affect animal welfare, the current possible actions are to end the experiment, thereby wasting time, money, and possibly animals, or submit a modification requesting to change the values with IACUC review via DMR or FCR. We feel that neither of these responses do enough to assure animal welfare. We feel that veterinary review and approval of alternate values or ranges would give investigators the ability to proceed with their project, thus not wasting animals, while improving the animal's welfare.

Section A

Section A states that significant changes are those changes that have or may have a direct impact on animal welfare. This statement implies that the impact of the changes on animal welfare could be positive or negative but, regardless of the type of impact, all those changes are significant and require IACUC review by DMR or FCR. We would suggest that many changes that have a positive impact on animal welfare should be considered minor changes. The second bullet point in Section A defines changes in the frequency, interval, number, or anatomical location of procedures and substances delivered to the animal as significant changes. We would contend that a decrease in the number, frequency, or interval of procedures, as long as the study

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remains scientifically valid, could have a positive impact on animal welfare. For example, a decrease in number of blood draws from 6 to 5 would have a direct positive effect on animal welfare and should not be considered a significant change. In addition, the general nature of the second bullet in Section A seems to eliminate many procedural changes that should be considered minor according to Section C, bullet 2. For instance, a change from intramuscular injection to subcutaneous injection for many substances could reduce discomfort to the animal; however, Section A, bullet 2 states that a change in anatomical location of a procedure is considered major. Thus, it becomes a matter of interpretation if an injection is considered a “procedure”. Clarification would be appreciated.

Section C describes what would be considered minor changes. While we agree that these are all minor changes, requiring that the IACUC be notified about these changes creates a huge burden on both the IACUC staff and the IACUC. We feel the IACUC’s time is much better spent discussing protocols, animal welfare, and providing guidance instead of being informed of these minor changes which have no effect on animal welfare.

Section C, bullet point 4 describes that a change in housing location or animal use location to one that is currently used for the same purpose and is part of the animal program overseen by the IACUC is a minor change. We do not believe that this situation should require a change at all. As long as the animal is housed in an animal housing area that is overseen by the IACUC, the actual room number is not significant. Animals in our animal facility are moved all the time to different rooms for many reasons. That decision is made by the animal care facility supervisors or veterinarians in consultation with the investigators. The investigators and IACUC staff should not have to be burdened with making changes when animals are moved from one area to another as described above. We recommend this bullet be removed.

Section C, bullet points 6, 7, and 8 should be removed from the list of minor changes. For IACUC staff to keep up with all of the grammatical, typographical, and contact information updates that occur is a huge regulatory burden that serves no purpose.

And finally, we believe that there should be more than two categories of changes. We would suggest the following:

Significant- changes in this category would require IACUC review by DMR or FCR

Veterinary- changes in this category would require approval by the Attending Veterinarian, or their designee

Minor- changes in this category would be approved by administrative staff.

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The Significant and Minor categories would be similar to those stated in NOT-OD-14-063 with the changes recommended above in our response. Veterinary change would include changes in analgesia, sedation, anesthesia, euthanasia, and investigative drugs and substances. Nobody knows more about these topics than the veterinarians and their input is critical to the approval of these changes. Of course, a Veterinary change could be moved to the Significant category requiring IACUC approval by DMR or FCR if the veterinarian did not feel comfortable or qualified to make the decision regarding animal welfare. In addition, if an IACUC wanted to be involved in all decisions involving these substances, they could simply choose to not use this category.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Henegar". The signature is fluid and cursive, with a large initial "J" and "H".

Jeff Henegar, Ph.D.
Director, Animal Care and Quality Assurance
University of Missouri